

In The United States District Court
for the Eastern District of Wisconsin.

Plaintiff:

Bryan Conner, Doc #616957

-vs-
Defendants:

Travis Yakes - Lead Paramedic

Theresa Grube - Driver

Lifestar Emergency Medical Services LLC

279 S. 17th Street Ave Suite 8

West Bend, WI 53095

Case Number

#: 19-C-1457

Parties:

1.) Plaintiff is a "Citizen of Minnesota" and is filing
as such against Defendant who is and resides in
Wisconsin giving cause to file action in the United
States District Court. Plaintiff is located at New Lisbon
Correctional Inst. 2000 Progress Road New Lisbon, WI 53905

2.) Defendant: Lifestar Emergency Medical Services L.L.C.,
Travis Yakes, Theresa Grube: Lead Paramedic - Driver -
279 S. 17th Ave Suite 8 West Bend, WI 53095

Complaint

19-C-1457

Case Number

U.S. DISTRICT COURT
EASTERN DISTRICT-WI
FILED

Statement of Claim:

In the events of June 29th 2019 at 4:30th Travis Yakes
Lead Paramedic for Lifestar Emergency Medical Services
L.L.C. and Theresa Gruber - Driver also employed
by said Company doing business at 279 S. 17th
Ave Suite 8 West Bend, WI 53095.

Both employees caused unnecessary pain &
suffering by placing a Medial I.O. in my Right
tibia. This procedure was done by Mr. Yakes in
the back of his ambulance which was parked in
the Salley Port at Dodge Correctional Institution,
1 West Lincoln St Waupun, WI 53963 during
an emergent Call in which both employees responded to
at according to Mr Yakes report at 23:41:09 p.m on
June 29th 2019.

This Call was determined at the decision of Mr. Yakes
while assessing Mr. Conner's Condition to be in need of
being transported to Waupun Memorial Hospital because
of past surgeries and trauma to Spinal Cord after taking
a fall on unit 9 Cell 3 where Mr. Conner
slipped and had fallen into the wall head
first and lost consciousness until the two
paramedics were able to put Mr. Conner on a back board
and Cervical Collar after said assessment and

placed on stretcher and wheeled to the ambulance where per Mr. Yakes report spent time placing the I.O. in Mr. Conners Right tibia. This procedure was done against all procedures & protocols giving rise to Medical Neglect & Malpractice. I.O.'s are placed when a patient is literally dying and need medications & fluids to keep them alive in circumstances where the safety of the patient is Imminent and access to a hospital is beyond reach of the precious time for the patients life. Mr. Conner's life was not hanging in the balances, he was as of Mr. Yakes reports "responsive", coherent and in complete control of all faculties. Waupun Memorial Hospital is located at 620 W Brown St, Waupun, WI 53963 and per report was 1.0 miles from the prison. The procedure per report in the back of ambulance was conducted by first drilling a hole into the bone of Right tibia then placing a needle down into said hole to the center of tibia where there is a vein that Mr. Yakes had tapped into, when I.O. was in place Mr. Yakes then proceeded to flush the I.O. then saying after a Tearing Yell from Mr. Conner who was not at any point consulted or asked or had given consent to Mr. Yakes to perform such a painful & torturous, borderline criminal act while conscious & lucid in the ambulance that was literally 1 min from said emergency room where physicians and staff were standing by to do X-Rays & Ct's to Rule out any long term paralysis or damage. Mr. Yakes stated any + that the Hospital could have given

to me if Mr. Conner's Condition was so extreme to perform such a procedure so close to a hospital that he should not have been conscious let alone be awake to endure a procedure of this magnitude to have now given permanent physical & mental scarring and disfigurement.

It was these health professionals job to protect Mr. Conner from wanton infliction of pain and free from abuse & torture, to report any acts against Mr. Conner that would result in unnecessary pain and suffering not causing it. The I.O. that was placed is being blamed on DCI Staff by Mr. Vakes because they would not release an arm from cuffs and were being "incooperative & borderline obstructive", Clearly annoying Mr. Vakes to the point of Criminal assault for not asking Mr. Conner for permission to perform such a painful procedure 1 mile from a hospital while awake for a medical instrument that was never used by him or Hospital Staff that now causes pain in the tube on a daily basis and had spent 1 night in the Hospital 1 week later on 7/5/2019 - 7/6/2019 where the doctor suspected osteomyelitis and was given pain meds & antibiotics to help combat any questionable infection. Again all this from a procedure that was not OK'd nor used ever and Mr. Conner's life was not about to be lost. Mr. Conner is

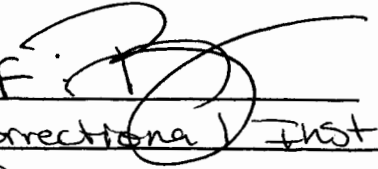
is seeking Damages against Mr. Yakes, Theresa Grube and LifeStar Emergency medical Services L.L.C. in the sum of \$250,000.⁰⁰ for Pain & Suffering, wanton infliction of pain, deliberate indifference to Mr. Conners medical needs by slowing access to medical care by staff of Leavenworth Memorial Hospital where they had stood by waiting while Mr. Yakes was performing said procedure that was not OK'd by patient or the physician at the E.R. that was not used, Also for any and all future pain & suffering, Medical Neglect for failing to keep Mr. Conner safe and free from unwanted and unnecessary painful and torturous acts or procedure and to step in and protect shall any occurrences arise in which Case has failed by being such perpetrator of such torturous and heinous acts against Mr. Conner. and also Medical malpractice.

Mr. Conner also seeks any and all past and future medical costs that may arise from permanent disfigurement placed upon him by Mr. Yakes & Mrs. Grube.

MR. Conner would like to reserve the right to amend this Complaint at such time that he obtains Council in which is currently seeking help.

Bryan C. Conner Doc #61695

Date Complaint Filed or signed
September 30th 2019.

Plaintiff: 
New Lisbon Correctional Inst.
P.O. Box 4000
New Lisbon, WI 53095

C. Jurisdiction

☐ I am suing for violation of federal law under
28 U.S.C. § 1331.

- O R -

☒ I am suing under state law. The state citizenship
of the plaintiff(s) is (are) different from
the state citizenship of every defendant, and the
amount of money at stake in this case (not
counting interests and costs) is \$250,000.00

D. In the event of winning this action Mr. Conner requests
the Courts respectfully to instruct payment of \$250,000⁰⁰
or all awards in case to be paid to Plaintiff's inmate
trust account.

E. Jury Demand

☒ Jury Demand - I want a jury to hear my case

Dated this Day 30th of September 2019.

Respectfully Submitted


Signature of Plaintiff

616957

Plaintiff's Prisoner I.D. number

P.O. Box 4000 New Lisbon, WI 53950

Request to Proceed in District Court without Prepaying Filing Fee.

☒ I Do request that I be allowed to file this Complaint without paying the Filing Fee. I have Completed a request to proceed in the district Court without Prepaying the Fee and attached It to the Complaint.